1	RONALD J. TENPAS **E-filed 5/19/08**		
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9			
10	IN THE UNITED STATES DISTRICT COURT		
10	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
11	TOR THE NORTHERN DISTRICT OF CALIFORNIA		
12			
13	UNITED FARM WORKERS,) Case No. C 07-03950 JF AFL-CIO, et al.,)		
14			
	Plaintiffs,) STIPULATED MOTION		
15) TO REVISE JOINT CASE		
16	v.) MANAGEMENT STATEMENT		
17)		
18	ADMINISTRATOR,)		
19	UNITED STATES)		
20	ENVIRONMENTAL)		
	PROTECTION AGENCY,)		
21	Defendant.)		
22)		
23	Pursuant to Local Rule 7-12, the parties stipulate to the following revisions to the		
24	deadlines governing submission of the Index to the Administrative Record and dispositive		
25	motions in section I of the Supplement to the Joint Case Management Statement that was		
26			
27	filed on March on March 19, 2008, and approved by the Court at the case management		
28	conference held Friday, March 21, 2008. The deadlines in the Supplement to the Joint NO. C-07-03950 JF STIPULATED MOTION TO REVISE JOINT CASE MANAGEMENT STATEMENT		

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Case Management Statement were the first deadlines for submission of the record index and dispositive motions entered by the Court and there have been no previous extensions of those deadlines.

As described in the Supplement to the Joint Case Management Statement, plaintiffs and defendant have been discussing a settlement of this case. Plaintiffs and defendant continue to be hopeful that a settlement can be reached. Intervenors have not been party to those discussions, and join this stipulation without prejudice to their pending Motion to Dismiss.

While plaintiffs and defendant have had discussions concerning the administrative record, and defendant has produced a draft index to plaintiffs, the effort of plaintiffs and defendant has been on settlement and they have not yet agreed upon the excerpts of record to be submitted to the Court. Accordingly, to allow plaintiffs and defendants to continue to focus their efforts on settlement, an extension of the deadlines in the Supplement to the Joint Case Management Statement is appropriate. Furthermore, the Court indicated at the May 9 hearing on intervenor's motion to dismiss that it intends to grant plaintiffs' motion regarding the administrative record, which is likely to require supplementation of the record and a further extension of the deadlines for submission of the administrative record and for dispositive motions. Thus, this extension is not likely to delay ultimate resolution of this case.

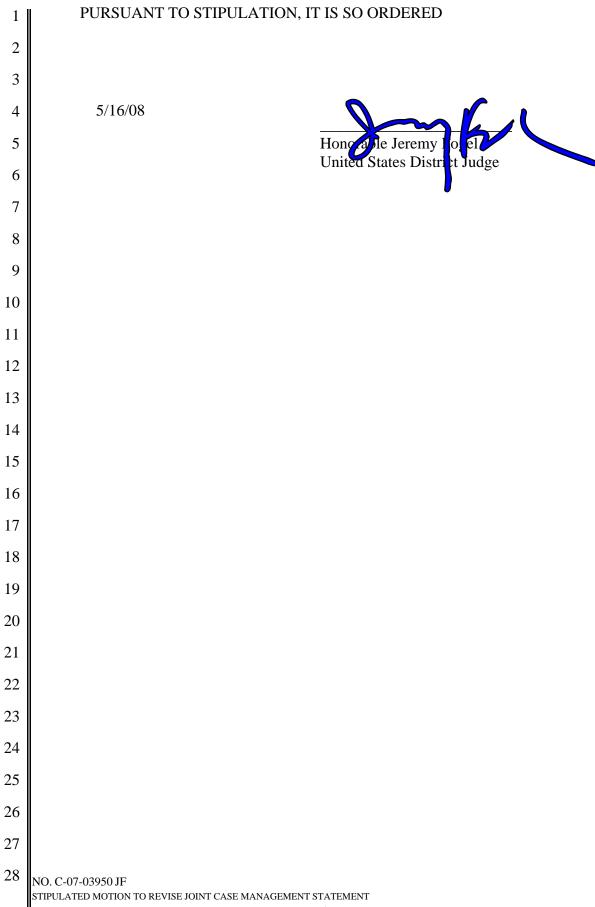
Accordingly, the parties stipulate to the following revised deadlines:

July 14, 2008 EPA will file with the Court and serve on the other parties a certified index to the administrative records and the agreed-upon excerpts of the records.

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1	September 15, 2008	Plaintiffs' Motion for Summary Judgment due	
2	November 14, 2008	Defendant's and Intervenor's Oppositions and	
3		Cross-Motions due	
4	December 12, 2008	Plaintiffs' Reply and Opposition due.	
5	Respectfully submitte	ed this 15th day of May, 2008.	
6 7		RONALD J. TENPAS	
8		Assistant Attorney General	
9		/S/ Norman L. Rave, Jr. NORMAN L. RAVE, JR.	
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